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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,) Chapter 11
Debtors.) Jointly Administered

**CERTIFICATE OF NO OBJECTION REGARDING
RESCAP BORROWER CLAIMS TRUST'S MOTION FOR ORDER
EXTENDING THE TERM OF THE BORROWER CLAIMS TRUST**

1. The undersigned hereby certifies that, as of the date hereof, he is not aware of any answer, objection or other responsive pleading to the relief sought in the following motion, filed by the ResCap Borrower Claims Trust on November 23, 2016 (the “**Motion**”):

Motion for Order Extending the Term of the Borrower Claims Trust (Dkt. # 10231)

2. The undersigned further declares that he has caused a review of the Court’s docket in this case and has not been advised that any other answer, objection or other responsive pleading to the Motion appears thereon. The deadline for filing responses to the Motion, December 5, 2016, has passed.

3. In accordance with the *Order Under Bankruptcy Code Section 102(1), 105(a) and 105(d), Bankruptcy Rules 1015(c), 2002(m) and 9007 and Local Bankruptcy Rule 2002-2 Establishing Certain Noticing, Case Management and Administrative Procedures* entered on

May 23, 2012 (Dkt. # 141) (the “**Case Management Procedures**”), the undersigned submits this Certificate of No Objection pursuant to 28 U.S.C. § 1746.

4. Accordingly, for the reason set forth in the Motion, the ResCap Borrower Claims Trust respectfully requests that the proposed order granting the Motion, attached hereto as Exhibit A, be entered in accordance with the Case Management Procedures.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: December 9, 2016
New York, New York

/s/ Daniel J. Flanigan

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December, 2016, a true and correct copy of the *Certificate of No Objection Regarding ResCap Borrower Claims Trust’s Motion for Order Extending the Term of the Borrower Claims Trust* was filed with the court using the CM/ECF system that served notice of such filing to Debtors’ counsel and counsel for the Liquidating Trust, the U.S. Trustee, and all interested parties.

/s/ Daniel J. Flanigan

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,) Chapter 11
Debtors.) Jointly Administered

ORDER EXTENDING THE TERM OF THE RESCAP BORROWER CLAIMS TRUST

This matter coming before the Court on the motion (the “Motion”)¹ filed by the ResCap Borrower Claims Trust, which is successor in interest to the debtors (collectively, the “Debtors”) in the above-captioned chapter 11 cases, for entry of an order pursuant to the terms of the *Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC et al. and the Official Committee of Unsecured Creditors* [Docket No. 6065-1] (the “Chapter 11 Plan”), extending the term of the Borrower Claims Trust for a period of two years from the third anniversary of the Effective Date; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 11 U.S.C. § 105 and 28 U.S.C. § 1334 and the Amended Standing Order of Referral of Cases to Bankruptcy Court Judges of the District Court for the Southern District of New York, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(B); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and no other or further notice need be provided; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as provided herein.
2. The duration of the Borrower Trust is extended through and including December 17, 2018, without prejudice to the Borrower Trust's ability to (i) seek further extensions or (ii) dissolve the Trust in accordance with the Plan and the Borrower Claims Trust Agreement.
3. The Court shall retain jurisdiction relating to the interpretation and implementation of this Order.

Dated: _____, 2016
New York, New York

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE